

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

GREG BROWN

PLAINTIFF

V.

CIVIL ACTION NO.: 2:23-cv-02027-SHM-atc

**OFFICERS OF THE DESOTO COUNTY,
MISSISSIPPI CHANCERY COURT;
JUDGE MITCHELL M. LUNDY;
MISTY HEFFNER; KIMBERLY McDOWELL;
DEREK D. HOPSON; JERRY WESLEY HISAW;
ELIZABETH PAIGE WILLIAMS; MELANIE WELLS;
BRANDIE CORRERO; URUA W. MYERS**

DEFENDANTS

**DEFENDANTS ELIZABETH PAIGE WILLIAMS' AND BRANDIE CORRERO'S
MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants Elizabeth Paige Williams and Brandie Correro (“Moving Defendants”) move this Court to extend the time period during which Moving Defendants may respond to Plaintiff’s Complaint [Dkt. #1]. In support of this motion, Moving Defendants state to the Court the following:

1. Plaintiff Greg Brown filed his complaint on January 20, 2023. [Dkt. #1]. Plaintiff recently attempted service of process on Moving Defendants, but such service was improper and ineffective under Fed. R. Civ. P. 4.

2. Even though service was improper and ineffective under Fed. R. Civ. P. 4, Moving Defendants have several reasons for requesting this Court set a time definite for them to respond to Plaintiff’s Complaint. First, Moving Defendants wish to avoid Plaintiff, as a pro se party, contending that he effected proper service of process on them and applying for a clerk’s entry of default, which would necessarily multiply these proceedings. Second, they further wish for a

speedy and efficient resolution of any subsequent motion they file under Fed. R. Civ. P. 12. Third, and perhaps most importantly, undersigned counsel for Moving Defendants were just retained and need additional time to learn about the case in order to provide the best possible representation for their clients.

3. Accordingly, Moving Defendants request thirty days from the date the Court rules on the instant motion within which to respond to Plaintiff's complaint filed in this matter.

MEMORANDUM

Under Rules 1, 6(b), and 11 of the Federal Rules of Civil Procedure, Moving Defendants submit that granting this enlargement of time (their first requested) will allow their counsel time to investigate Plaintiff's complaint and respond appropriately and in accordance with the Federal Rules of Civil Procedure. Because Plaintiff has not effected service of process on Moving Defendants, the requested thirty day extension will not result in prejudice to any party to this action. Instead, it would promote the efficient and timely resolution of the matters before this Court.

CONCLUSION

For the reasons discussed above, Defendants Elizabeth Paige Williams and Brandi Correro request that this Court grant them thirty days within which to respond to Plaintiff's complaint.

RESPECTFULLY SUBMITTED, this the 1st day of March, 2023.

**ELIZABETH PAIGE WILLIAMS and BRANDI
CORRERO**

By: /s/ D. Jason Childress
CHARLES E. COWAN (*pro hac vice pending*)
D. JASON CHILDRESS (BPR #035536)

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CERTIFICATE OF CONSULTATION

By my signature below, I hereby certify that I was unable to consult by telephone or electronic mail with Plaintiff Greg Brown proceeding pro se since he has not listed a telephone number or email address in this matter prior to the filing of this Motion and therefore do not know whether or not he opposes the relief sought.

/s/ D. Jason Childress

D. JASON CHILDRESS

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the ECF system which will send notification of such filing to all attorneys of record. I have separately mailed a copy to Plaintiff, a non-ECF participant, at his address listed on the ECF docket.

THIS is the 1st day of March, 2023.

/s/ D. Jason Childress

D. JASON CHILDRESS